

Gregory Zimmer, Esq.

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March 24, 2025

VIA ECF

Honorable Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 443
New York, New York 10007

Re: In re Navidea Biopharmaceuticals Litigation, Case No. 19-cv-01578-VEC

Dear Judge Caproni:

I represent Counterclaim Plaintiff, Dr. Michael M. Goldberg, M.D. (“Dr. Goldberg”) in the referenced action. I enclose herein a copy of my monthly billing records for calendar year 2024, comprising Exhibit Y to Dr. Goldberg’s attorneys’ fee application, which was inadvertently omitted from Dr. Goldberg’s earlier filing.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Gregory Zimmer, Esq.

Gregory Zimmer, Esq.
142 New Chalet Drive
Mohegan Lake, NY 10547
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cc: James G. Ruiz, Esq.
Elin Eisenhower, Esq.

GREGORY ZIMMER, ESQ.
 142 New Chalet Drive
 Mohegan Lake, New York 10547

May 2, 2024

VIA ELECTRONIC MAIL

Michael M. Goldberg, M.D.
 207 Booth Avenue
 Englewood, NJ 07631
 MGoldberg@MontaurCap.com

INVOICE NUMBER: 0017
 MATTER NUMBER: 03 – PPVA Dispute

		HOURS
4/02/2024	GREGORY ZIMMER Review expert issues re damages in preparation for oral argument on motion to strike M. Goldberg expert disclosure.	1.70
4/03/2024	GREGORY ZIMMER Prepare for and participate in oral argument re motion to strike M. Goldberg expert disclosure.	2.20
4/04/2024	GREGORY ZIMMER Review expert deposition in preparation for preparing expert report of M. Goldberg; review M. Goldberg notes on PPVA expert report; t/c w/ M. Kook re M. Goldberg expert report.	2.10
4/05/2024	GREGORY ZIMMER Review PPVA expert deposition i/c/w preparation of expert report of M. Goldberg.	1.50
4/06/2024	GREGORY ZIMMER Review PPVA expert deposition i/c/w preparation of expert report of M. Goldberg.	1.20
4/08/2024	GREGORY ZIMMER T/c w/ M. Goldberg and M. Kook re M. Goldberg expert report.	0.50
4/10/2024	GREGORY ZIMMER Work on M. Goldberg expert report; t/c w/ M. Goldberg re same.	2.00
4/11/2024	GREGORY ZIMMER Continue drafting M. Goldberg expert report; t/c w/ M. Goldberg re expert and valuation issues.	3.50

Michael M. Goldberg, M.D.

May 2, 2024

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4/12/2024	GREGORY ZIMMER Prepare M. Goldberg expert report.	5.00
4/13/2024	GREGORY ZIMMER Prepare M. Goldberg expert report.	5.50
4/15/2024	GREGORY ZIMMER Prepare M. Goldberg expert report; t/cs w/ M. Goldberg and M. Koook re same.	4.10

	<u>Amount</u>
	<u>\$11,720.00</u>
Courtesy Discount Applied:	<u>-\$1,000.00</u>
Balance Due:	<u>\$10,720.00</u>

Michael M. Goldberg, M.D.

May 2, 2024

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Timekeeper Summary

<u>Name</u>	<u>HOURS</u>	<u>Rate</u>
GREGORY ZIMMER	29.30	400.00
		<u>\$11,720.00</u>
		<u>TOTAL FEES</u>
		<u>\$11,720.00</u>

GREGORY ZIMMER, ESQ.
 142 New Chalet Drive
 Mohegan Lake, New York 10547

June 10, 2024

VIA ELECTRONIC MAIL

Michael M. Goldberg, M.D.
 560 Sylvan Ave, Third Floor
 Englewood Cliffs, NJ 07632
 MGoldberg@MontaurCap.com

INVOICE NUMBER: 0050
 MATTER NUMBER: 01 – Navidea/Macrophage Dispute

		HOURS
5/06/2023	GREGORY ZIMMER Review draft reply re cross-motion for reconsideration.	0.50
5/16/2024	GREGORY ZIMMER T/c w/ M. Golberg re potential settlement and terms.	1.00
5/21/2024	GREGORY ZIMMER Review <i>Daubert</i> decision i/c/w preparing settlement proposal; trial scheduling issues; corresp. w/ M. Goldberg re same; legal research re pre-judgment interest.	2.70
5/22/2024	GREGORY ZIMMER Additional issues re interest calculation; t/c w/ M. Goldberg re settlement; research discount for lack of marketability issues i/c/w <i>Daubert</i> issues; corresp. w/ M. Goldberg re same.	1.20
5/23/2024	GREGORY ZIMMER Corresp. re damages issues.	0.30
5/24/2024	GREGORY ZIMMER Draft settlement proposal to Navidea.	0.70

Michael M. Goldberg, M.D.

June 10, 2023

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5/29/2024 GREGORY ZIMMER 0.50
Revise settlement proposal to Navidea.

	<u>Amount</u>
	\$2,760.00
Balance Due:	<u>\$2,760.00</u>

Michael M. Goldberg, M.D.

June 10, 2023

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Timekeeper Summary

GREGORY ZIMMER, ESQ.
 142 New Chalet Drive
 Mohegan Lake, New York 10547

July 8, 2024

VIA ELECTRONIC MAIL

Michael M. Goldberg, M.D.
 560 Sylvan Ave, Third Floor
 Englewood Cliffs, NJ 07632
 MGoldberg@MontaurCap.com

INVOICE NUMBER: 0051
 MATTER NUMBER: 01 – Navidea/Macrophage Dispute

		<u>HOURS</u>
6/06/2024	GREGORY ZIMMER Review reconsideration decision; corresp. w. M. Goldberg re same.	0.50
6/07/2024	GREGORY ZIMMER T/c w/ W. Fang re reconsideration decision and next steps.	0.50
6/10/2024	GREGORY ZIMMER T/c W/ W, Fang re B. Kazan withdrawal motion.	0.20
6/11/2024	GREGORY ZIMMER T/c w/ M. Goldberg re B. Kazan withdrawal motion and implications for action going forward.	0.50
6/14/2024	GREGORY ZIMMER T/cs w/ M. Goldberg and J. Delgado re case status.	0.70
6/17/2024	GREGORY ZIMMER Participate in Court hearing re B. Kazan withdrawal motion; t/c w/ M. Goldberg re same; corresp. w/ Lowenstein team re same.	1.70
5/29/2024	GREGORY ZIMMER Revise settlement proposal to Navidea.	0.50
		<u>Amount</u>
		\$1,840.00
	Balance Due:	<u>\$1,840.00</u>

Michael M. Goldberg, M.D.

July 8, 2023

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Timekeeper Summary